

AFFIDAVIT FOR CRIMINAL COMPLAINT

1. I am Keith C. Moore, a United States Postal Inspector and have been so employed since September, 2005. I completed a twelve-week federal law enforcement basic training course in Potomac, Maryland, which provided training in U.S. mail operations investigations into mail theft and fraudulent activity related to the theft and alteration of stolen financial instruments. I am currently assigned to the Washington Division, Norfolk, Virginia Domicile and currently investigate violations involving the US Mail and Identity Theft. Your affiant has been involved in numerous arrests of individuals charged with mail theft and fraud related activity and has either assisted or been involved directly with approximately 100 searches of residences, hotel rooms, and/or motor vehicles where stolen mail was found and/or other fraudulent activities occurred.

2. The facts and information contained in this affidavit are based on my personal knowledge as well as that of the other agents involved in this investigation. All observations that were not made personally by me were related to me by the persons who made the observations.

3. Because this affidavit is being submitted for the limited purpose of securing a ~~search warrant~~ *criminal complaint*, your affiant has not included each and every fact known to me concerning this investigation. Your affiant has set forth only the facts that your affiant believes establishes a violation of federal law in support of this criminal complaint.

4. On Monday, October 24, 2022, a U.S. Postal Service Letter Carrier was accosted by an unknown black male wearing a hoodie. The suspect grabbed the U.S. Postal "arrow" key from the letter carrier's hand and ripped the chain off the letter carrier's pants, tearing the belt loop of the letter carrier's waistband. As the suspect fled, the letter carrier witnessed him holding a handgun in the rear of his pants.

5. A U.S. Postal arrow key is a large key with an engraved arrow symbol on the front along with a serial number which is issued in a series which corresponds with specific zip codes. Each series of arrow keys is capable of opening various types of mail receptacles in their specific areas including blue collection boxes and apartment panel mailboxes.

6. Prior to the letter carrier robbery, a covert security camera was set up at to monitor the blue collection boxes at the Indian River Post Office which has an address of 3810 Indian River Rd., Chesapeake, VA 23325. On Tuesday, October 25, 2022, at approximately 11:20 P.M., two unknown black males wearing hoodie sweatshirts are seen using a U.S. Postal arrow key to access the three boxes and remove the mail contents and place them into a bookbag. Two individuals wearing the same clothing and matching the prior description of the October 25, 2022, break in are also seen breaking into the Indian River Post Office blue collection boxes on 11/04/22, 11/18/22, 11/27/22, 12/3/22, 12/10/22, 12/12/22, 12/14/22, and 12/15/22.

7. The Postal Inspection Service also received complaints from customers who had stolen checks negotiated by unknown individuals after having placed their mail in blue collection boxes at other Chesapeake Post Offices like Chesapeake Main located at 1425 N. Battlefield Blvd, Chesapeake, VA 23320 and the Great Bridge Post Office located at 1100 S. Battlefield, Chesapeake, VA 23322.

8. On Monday, November 14, 2022, the Postal Inspection Service received a request to meet with a witness who saw two individuals break into the blue collection box located in front of the Chesapeake Main Post Office located at 1425 N. Battlefield Blvd. U.S. Postal Inspectors went to the Hampton Inn and Suites located at 1421 N. Battlefield Blvd., Chesapeake, VA 23320 to interview the witness.

9. Witness O.B. was a guest at the hotel and was staying on the fifth floor with family.

O.B. stated that at approximately 10:40 P.M. on the night of November 13, 2022, he was looking out of his window toward the north facing the post office. O.B. witnessed a white 4 door sedan back into a parking spot and then saw two black males exit the vehicle. O.B. saw the two males walk toward the blue collection boxes in front of the post office. O.B. stated that the two acted strangely because they lingered on the sidewalk for a period of time while traffic passed by. After a few minutes, the two males ducked behind the blue collection boxes where they were obstructed from O.B's view. A few minutes later, the two males emerged with a backpack and ran at full speed back to the white sedan. The white sedan sped out of the rear parking lot of the Hampton Inn and Suites without activating its lights. O.B. stated that the two males were wearing hoods and masks.

10. Postal Inspectors then visited the management office of the Hampton Inn and Suites to see if there was any video surveillance of the parking lot. Postal Inspectors were able to obtain video footage of a white four door sedan driving at a high rate of speed with its lights off. The vehicle sped from the rear of the parking lot at approximately 10:49 P.M. Postal Inspectors were able to determine that the vehicle was most likely a 2010-2013 Hyundai Sonata.

11. Postal Inspectors subsequently reached out to the Chesapeake Police Department Fraud Unit to see if they were receiving complaints about stolen checks that were deposited in blue collection boxes across the city. On Tuesday, November 29, 2022, Postal Inspectors were notified by the Chesapeake PD Fraud Unit regarding an anonymous tip that was received on November 23, 2022. The tipster stated that a black male named Isaiah Card made checks at his home located at 3111 Welcome Rd., Chesapeake, VA and that he was in possession of a key that unlocked the blue collection boxes. The tipster stated that Card drove a 2013 white Hyundai Sonata with 30-day tags.

12. On Sunday, December 18, 2022, Postal Inspectors along with the Chesapeake, Virginia Police Department conducted surveillance at the Chesapeake Main Post Office. At approximately 11:37 P.M., a black, 4 door Lexus entered the rear entrance to the Hampton Inn and Suites located at 1421 N. Battlefield Blvd. The vehicle backed into a parking space and two occupants exited the vehicle with hoods on. The driver remained in the vehicle. Postal Inspectors witnessed the two hooded individuals walk westbound in the parking lot and then north to the blue collection boxes.

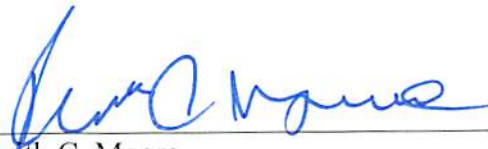
13. Postal Inspectors watched the collection boxes firsthand as well as through covert video cameras as the two assailants used a Postal arrow key to unlock the boxes and remove the contents and place them in a bag. The two assailants were then observed running back to the black Lexus located on the back portion of the side Hampton Inn and Suites parking lot. Postal Inspectors began to move in to block the vehicle in as the two arrived at the side of the black Lexus. As Postal Inspectors activated their emergency police lights, the two assailants took off on foot in a westbound direction, which is the same direction from which they came. Postal Inspectors concentrated on safely detaining the driver of the Lexus and requested Chesapeake PD to assist in the apprehension of the two fleeing assailants. After the driver was placed in handcuffs he was asked what his name was and he responded that his name was Isaiah J. Card. While conducting a safety clearance of the vehicle, two loaded Glock handguns were seen with large extension magazines. One was located in the footwell in front of the driver's seat and the other was located in the back seat behind the driver. A later more thorough search found a third handgun in the passenger seat area as well as some spent shell casings in the vehicle. The large bag filled with mail was left next to the black Lexus and included approximately 250 pieces of stolen mail.

14. Approximately 15 minutes later, Chesapeake PD was able to locate one of the two

assailants who was on foot. He was identified as Dahnico Jharon Mccoy. Chesapeake PD also found discarded clothing along the path that Mccoy fled which included the same black jacket with distinct writing on the back seen in at least five prior collection box break-ins.

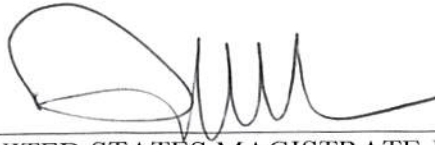
15. Both Card and Mccoy were taken into custody and read their Miranda rights. Card admitted that the Glock that was located beneath his feet was in fact his and that he purchased it a couple of weeks ago.

16. Based upon the facts and information presented above, there is probable cause to believe that Isaiah J. Card and Dahnico Jharon Mccoy did knowingly steal, take and abstract from and out of any post office, letter box, and mail receptacle, any letter, postal card, package, and bag, in violation of Title 18, United States Code, Section 1708. By this application and affidavit, I respectfully request the issuance of a criminal complaint for ISAIAH J. CARD and DAHNICO JHARON MCCOY.



Keith C. Moore
U.S. Postal Inspector

Subscribed and sworn before me this 19 day of December, 2022 at Norfolk, Virginia



UNITED STATES MAGISTRATE JUDGE

Douglas E. Miller
United States Magistrate Judge